

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Pauline Kanchanalak

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CONCILIATION AGREEMENT

This matter was generated by information ascertained by the Federal Election Commission ("Commission") in the normal course of carrying out its supervisory responsibilities. An investigation was conducted, and the Commission found probable cause to believe that Pauline Kanchanalak (a.k.a. Pornpimol Parichattkul) ("Respondent") knowingly and willfully violated 2 U.S.C. §§ 441e(a) and 441f in connection with contributions and donations made to the Democratic National Committee ("DNC") and other political committees during the period 1992-1996.

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), do hereby agree as follows:

- I. The Commission has jurisdiction over Respondent and the subject matter of this proceeding.
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. Respondent enters voluntarily into this agreement with the Commission.
- IV. The pertinent facts in this matter are as follows:
 1. During the period 1992-1996, Pauline Kanchanalak engaged in extensive business and political activities in the United States along with members of her family, including her sister-in-law Duangnet ("Georgie") Kronenberg. Pauline Kanchanalak was president and a

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director of Ban Chang International (USA) Inc. ("BCI USA"), a Cayman Islands corporation with offices during 1993 to 1996 in Washington, D.C. BCI USA was affiliated with Ban Chang International (Thailand), Ltd. ("BCI Thailand"), a Thai corporation. Pauline Kanchanalak's husband Chupong Kanchanalak was Vice President and a director of BCI USA, as well as the Managing Director and/or President of BCI Thailand. Ms. Kronenberg was the Secretary of BCI USA. Pauline Kanchanalak was also a director of AEGIS Capital Management Limited ("AEGIS"), a Hong Kong corporation which shared office space with BCI USA in Washington, D.C., from about November 1993 until at least July 1996. AEGIS's other director was Supharb Parichattkul, Pauline Kanchanalak's mother. Ms. Kronenberg was the Secretary of AEGIS. Praitun Kanchanalak, mother of Ms. Kronenberg and mother-in-law of Pauline Kanchanalak, was not an officer, director, or employee of BCI USA, BCI Thailand or AEGIS. During the relevant period, Pauline Kanchanalak was also regarded as a major Democratic party donor and fundraiser. At all relevant times, Pauline Kanchanalak, Chupong Kanchanalak and Supharb Parichattkul were neither citizens nor permanent residents of the United States. However, Ms. Kronenberg and Praitun Kanchanalak were permanent residents of the United States.

2. The Federal Election Campaign Act of 1971, as amended (the "Act"), prohibits the solicitation, making, and receipt of any political contribution or donation from a foreign national. Section 441e(a) provides:

It shall be unlawful for a foreign national directly or through any other person to make any contribution of money or other thing of value, or to promise expressly or impliedly to make any such contribution, in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office; or for any person to solicit, accept, or receive any such contribution from a foreign national.

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2 U.S.C. § 441e(a). Pursuant to 11 C.F.R. § 110.4(a)(3), it is a violation of 2 U.S.C. § 441e(a) for a foreign national to participate in any decision-making process regarding any federal or non-federal election-related activities, including contributions or expenditures. These prohibitions apply to all federal, state, and local elections, and to expenditures and contributions by foreign nationals, including donations to the non-federal accounts of national party committees. See 11 C.F.R. § 110.4(a)(1); United States v. Kanchanalak, 192 F.3d 1037, 1049-50 (D.C. Cir. 1999).

3. Under Section 441e of the Act, the term "foreign national" includes foreign principals as defined in 22 U.S.C. § 611(b), and individuals who are not United States citizens and not lawfully admitted for permanent residence as defined in 8 U.S.C. § 1101(a)(20). See 11 C.F.R. § 110.4(a)(4). Under 22 U.S.C. § 611(b), the term "foreign principal" includes:

- (1) a government of a foreign country and a foreign political party;
- (2) a person outside the United States, unless it is established that such person is an individual and a citizen of and domiciled within the United States, or that such person is not an individual and is organized under or created by the laws of the United States or of any State or other place subject to the jurisdiction of the United States and has its principal place of business within the United States; and
- (3) a partnership, association, corporation, organization, or other combination of persons organized under the laws of or having its principal place of business in a foreign country.

22 U.S.C. § 611(b). Permanent residents of the United States are not considered to be foreign nationals, and so they are permitted to make contributions and participate in the process of making contribution decisions, so long as they are physically present in the United States. See 2 U.S.C. §§ 441c(b)(1), (2); 8 U.S.C. § 1101(a)(20); 22 U.S.C. § 611(b)(2).

4. It is unlawful for any person to make a contribution in the name of another person, to knowingly permit her name to be used to effect such a contribution, or to knowingly accept such a contribution. 2 U.S.C. § 441f. The term "contribution" includes any gift, subscription,

loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. 2 U.S.C. § 431(8)(a)(i). Pursuant to 11 C.F.R. § 110.4(b)(1)(iii), it is a violation of 2 U.S.C. § 441f for a person to knowingly assist any person in making such conduit contributions.

5. Respondent, along with Ms. Kronenberg, engaged in a course of conduct from 1992 to 1996 whereby over \$700,000 originating with BCI USA; BCI Thailand, AEGIS, Chupong Kanchanalak, Supharb Parichattkul, Respondent herself, and other foreign nationals was channeled through Ms. Kronenberg and Praitun Kanchanalak--who were permanent United States residents--and thus converted into federal contributions and non-federal donations to the DNC and other political committees. Pauline Kanchanalak and Ms. Kronenberg engaged in a series of financial transactions and other conduct designed to hide the real sources of these contributions and donations, including passing funds from the foreign sources through corporations Pauline Kanchanalak controlled, and causing the recipient political committees to receive contribution checks drawn on Praitun Kanchanalak's account and imprinted and signed "P. Kanchanalak." The ultimate goal of the above actions was to gain access to high-level federal officials for Pauline Kanchanalak and her business clients.

6. In 1992, Pauline Kanchanalak along with Ms. Kronenberg caused \$29,250 in contributions or donations from foreign sources and \$28,750 in conduit contributions to be made to the DNC and other political committees, as follows:

<u>Date</u>	<u>Amount</u>	<u>Recipient Committee</u>	<u>Nominal Account Used</u>
9/23/92	\$4,000	DNC (Federal)	Duangnet Kronenberg
9/24/92	\$5,000	DNC (Federal)	Duangnet Kronenberg

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9/25/92	\$11,000	DNC (Federal)	Praitun Kanchanalak
9/29/92	\$1,000	DNC (Federal)	Duangnet Kronenberg
10/5/92	\$500	Wayne Owens for Senate Committee	Praitun Kanchanalak
10/20/92	\$500	Committee for Catherine Baker Knoll, State Treasurer	Praitun Kanchanalak
10/20/92	\$5,000	Democratic State Central Committee of California (Federal)	Praitun Kanchanalak
10/20/92	\$250	Democratic Senatorial Campaign Committee ("DSCC")	Praitun Kanchanalak
10/29/92	\$1,000	Friends of Marjorie Margolies-Mezvinsky	Praitun Kanchanalak
10/29/92	\$1,000	Friends of Marjorie Margolies-Mezvinsky	Duangnet Kronenberg
TOTAL 1992	\$29,250		

7. In 1993, Pauline Kanchanalak along with Ms. Kronenberg caused \$15,485 in contributions or donations from foreign sources and \$14,485 in conduit contributions to be made to the DNC and other political committees, as follows:

<u>Date</u>	<u>Amount</u>	<u>Recipient Committee</u>	<u>Nominal Account Used</u>
2/3/93	\$1,000	Mike Woo for Mayor	Praitun Kanchanalak
7/21/93	\$750	Democratic Congressional Campaign Committee ("DCCC")	Praitun Kanchanalak
7/21/93	\$750	DSCC	Praitun Kanchanalak
7/21/93	\$1,500	Democratic House and Senate Council	Praitun Kanchanalak
8/4/93	\$750	DCCC	Praitun Kanchanalak

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8/4/93	\$1,500	Democratic Congressional Dinner Committee	Praitun Kanchanalak
8/10/93	\$2,000	Friends of Marjorie Margolies-Mezvinsky	Duangnet Kronenberg
8/10/93	\$2,000	Friends of Marjorie Margolies-Mezvinsky	Praitun Kanchanalak
8/31/93	\$750	DSCC	Praitun Kanchanalak
9/13/93	\$200	DNC (Federal)	Praitun Kanchanalak
10/20/93	\$1,000	DNC (Federal)	Praitun Kanchanalak
11/10/93	\$285	Friends of Marjorie Margolies-Mezvinsky	Praitun Kanchanalak
11/29/93	\$750	DCCC	Praitun Kanchanalak
11/29/93	\$750	DSCC	Praitun Kanchanalak
11/29/93	\$1,500	Democratic Congressional Dinner Committee	Praitun Kanchanalak
TOTAL 1993	\$15,485		

8. In 1994, Pauline Kanchanalak along with Ms. Kronenberg caused \$121,250 in contributions or donations from prohibited foreign sources and \$44,500 in conduit contributions to be made to the DNC and other political committees, as follows:

<u>Date</u>	<u>Amount</u>	<u>Recipient Committee</u>	<u>Nominal Account Used</u>
3/17/94	\$15,000	DNC (Federal)	Praitun Kanchanalak
3/22/94	\$1,500	Gephardt in Congress	Praitun Kanchanalak
4/18/94	\$15,000	DNC (Non-Federal)	Praitun Kanchanalak
4/27/94	\$250	Friends of Catherine Baker Knoll, State Treasurer	Praitun Kanchanalak

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5/3/94	\$1,000	Friends of Marjorie Margolies-Mezvinsky	Praitun Kanchanalak
5/3/94	\$1,000	Friends of Marjorie Margolies-Mezvinsky	Praitun Kanchanalak
5/19/94	\$1,000	Kennedy for Senate	Praitun Kanchanalak
5/25/94	\$1,000	Friends of John Glenn	Duangnet Kronenberg
5/26/94	\$20,000	DNC (Federal)	Duangnet Kronenberg
6/7/94	\$15,000	DNC (Non-Federal)	Duangnet Kronenberg
9/8/94	\$5,000	Massachusetts Democratic Committee (Non-Federal)	Duangnet Kronenberg
9/20/94	\$500	Friends of Jane Harman	Duangnet Kronenberg
10/6/94	\$5,000	Oklahoma Democratic Party (Non-Federal)	Duangnet Kronenberg
10/6/94	\$4,000	Maryland Democratic Party (Non-Federal)	Duangnet Kronenberg
10/6/94	\$2,500	Kentucky Democratic Party (Federal)	Duangnet Kronenberg
10/6/94	\$1,000	West Virginia Democratic Party (Federal)	Duangnet Kronenberg
10/14/94	\$32,500	DNC (Non-Federal)	Praitun Kanchanalak
TOTAL 1994	\$121,250		

9. The 1994 contributions and donations detailed above were made with funds provided to Praitun Kanchanalak and Ms. Kronenberg by BCI USA. In about early 1994, BCI USA had budgeted \$130,000 for political contributions in the United States for the year 1994. One of the budgeted items was \$100,000 in contributions to the DNC to pay for "Renewal of DNC Trusteeship." The checks used to make the contributions and donations for which

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Praitun Kanchanalak served as nominal contributor or donor were imprinted and signed "P. Kanchanalak," in order to cause the recipient political committees to believe that they were from an account held by Pauline Kanchanalak. In May 1994, Pauline Kanchanalak caused Ms. Kronenberg to provide the above \$20,000 contribution check to the DNC, and caused BCI USA to reimburse Ms. Kronenberg for that amount, in connection with a May 26, 1994 DNC fund-raising event featuring then-Chairperson of the President's Council of Economic Advisors Laura D'Andrea Tyson. In about September 1994, Pauline Kanchanalak pledged to donate \$50,000 as co-chair of the Second Annual Issues Conference of the Women's Leadership Forum to be held in early October 1994 in Washington, D.C. The \$32,500 DNC donation in October 1994 which is listed above was made partially to fulfill this pledge.

10. In 1995, Pauline Kanchanalak along with Ms. Kronenberg caused a \$1,000 conduit contribution from a foreign source to be made to the Clinton/Gore '96 Primary Committee, as follows:

<u>Date</u>	<u>Amount</u>	<u>Recipient Committee</u>	<u>Nominal Account Used</u>
6/16/95	\$1,000	Clinton/Gore '96 Primary Committee	Praitun Kanchanalak
TOTAL 1995	\$1,000		

11. In 1996, Pauline Kanchanalak along with Ms. Kronenberg caused \$536,500 in contributions or donations from prohibited foreign sources and \$18,000 in conduit contributions to be made to the DNC and other political committees, as follows:

<u>Date</u>	<u>Amount</u>	<u>Recipient Committee</u>	<u>Nominal Account Used</u>
2/26/96	\$10,000	DNC (Federal)	Praitun Kanchanalak

2/26/96	\$5,000	DNC (Federal)	Duangnet Kronenberg
3/8/96	\$5,000	DNC (Non-Federal)	Duangnet Kronenberg
3/14/96	\$5,000	DNC (Non-Federal)	Duangnet Kronenberg
5/23/96	\$5,000	DNC (Non-Federal)	Praitun Kanchanalak
5/23/96	\$5,000	DNC (Non-Federal)	Duangnet Kronenberg
6/13/96	\$30,000	California Democratic Party (Non-Federal)	Duangnet Kronenberg
6/15/96	\$25,000	Florida Democratic Party (Non-Federal)	Duangnet Kronenberg
6/18/96	\$50,000	DNC (Non-Federal)	Duangnet Kronenberg
6/18/96	\$30,000	Illinois Democratic Party (Non-Federal)	Duangnet Kronenberg
6/19/96	\$85,000	DNC (Non-Federal)	Praitun Kanchanalak
6/21/96	\$20,000	Ohio Democratic Party (Non-Federal)	Duangnet Kronenberg
6/24/96	\$50,000	DNC (Non-Federal)	Praitun Kanchanalak
6/25/96	\$25,000	Pennsylvania Democratic Party (Non-Federal)	Duangnet Kronenberg
6/25/96	\$24,500	California Democratic Party (Non-Federal)	Praitun Kanchanalak
6/27/96	\$35,000	Florida Democratic Party (Non-Federal)	Praitun Kanchanalak
6/29/96	\$33,000	Ohio Democratic Party (Non-Federal)	Praitun Kanchanalak
7/5/96	\$25,000	Illinois Democratic Party (Non-Federal)	Praitun Kanchanalak
7/5/96	\$25,000	Pennsylvania Democratic Party (Non-Federal)	Praitun Kanchanalak

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8/26/96	\$1,000	Coopersmith for Congress	Duangnet Kronenberg
8/26/96	\$1,000	Coopersmith for Congress	Praitun Kanchanalak
9/13/96	\$40,000	DNC (Non-Federal)	Praitun Kanchanalak
9/13/96	\$1,000	Gary Locke for Governor	Praitun Kanchanalak
10/31/96	\$1,000	Coopersmith for Congress	Duangnet Kronenberg
TOTAL	\$536,500		
1996			

12. Nearly all of the 1996 contributions and donations detailed above were made in connection with several major fund-raising events, specifically the February 19, 1996 Hay-Adams Hotel dinner in Washington, D.C., a June 18, 1996 White House "coffee," and an August 18, 1996 Presidential Birthday Dinner held at the Waldorf-Astoria Hotel in New York City.

13. On February 19, 1996, Pauline Kanchanalak and Ms. Kronenberg attended a DNC fundraising dinner at the Hay-Adams Hotel in Washington, D.C. In order to make the \$25,000 in donations necessary for two persons to attend this event, Pauline Kanchanalak caused four separate checks to be delivered to the DNC between late February and mid-March 1996: one \$10,000 check with Praitun Kanchanalak serving as nominal contributor, and three \$5,000 checks with Ms. Kronenberg serving as nominal donor. To reimburse these donations, Pauline Kanchanalak and Ms. Kronenberg caused funds originating with foreign nationals to be transferred to a BCI USA account and ultimately to the nominal donors. About \$15,000 of these funds were wired to the BCI USA account by an individual affiliated with Chupong Kanchanalak, and about \$10,000 of the funds were wired to that account by a Thai corporation affiliated with BCI USA. Ms. Kronenberg caused a \$15,000 BCI USA check to be issued payable to her mother Praitun Kanchanalak on about February 21, 1996, and caused this

check to be deposited in an account held by her mother. On about February 26, 1996, Ms. Kronenberg caused a check for \$10,000 to be written on her mother's account payable to the DNC. Ms. Kronenberg caused the DNC to receive this contribution.

14. Of the \$536,500 in 1996 contributions and donations listed above, \$457,500 worth were donations made in connection with a White House "coffee" which was arranged for Pauline Kanchanalak and held on June 18, 1996. This coffee was also attended by President Clinton, several DNC officials including Chairman Don Fowler and Vice Chair for Finance John Huang, and two executives of a large Thai corporation and BCI USA client called the Charoen Pokphand Group ("CP Group"), among others. The Chairman of the CP Group spoke for the majority of the coffee, discussing primarily economic and political issues relating to the relationship between the United States and the People's Republic of China.

15. Pauline Kanchanalak and Ms. Kronenberg arranged for the above contributions and donations to be made in connection with the June 18, 1996 coffee using funds wired into United States bank accounts by Chupong Kanchanalak. In early to mid-June 1996, Chupong Kanchanalak wired a total of \$475,510 into three different United States accounts: \$275,510 into an account held by AEGIS, \$100,000 into an account held by Praitun Kanchanalak, and \$100,000 into an account held by Ms. Kronenberg. After a series of transfers involving accounts apparently held by AEGIS, Pauline Kanchanalak, and Chupong Kanchanalak, at least \$457,500 of the original amount transferred from Chupong Kanchanalak was in accounts held by Praitun Kanchanalak and Ms. Kronenberg. Between June 13 and July 5, 1996, \$180,000 in donations were written on Ms. Kronenberg's account to the DNC and five state party committees, and \$277,500 in donations were written on Praitun Kanchanalak's account to these same committees, for a total of \$457,500 in donations.

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16. On about August 18, 1996, Pauline Kanchanalak and Ms. Kronenberg traveled to New York City for a DNC fund-raising event being held on that date at the Waldorf-Astoria Hotel, in celebration of President Clinton's 50th birthday. On about August 19, 1996, BCI USA issued a check for \$20,000 signed by and made out to Ms. Kronenberg, who also wrote a \$20,000 personal check payable to Praitun Kanchanalak, which was then deposited in an account held by Praitun Kanchanalak. On about August 26, a \$1,000 check was written on Praitun Kanchanalak's account (imprinted and signed "P. Kanchanalak"), and a \$1,000 check was written on an account held by Ms. Kronenberg; both \$1,000 checks were made payable to Coopersmith for Congress. On about September 10, 1996, BCI USA issued a \$21,000 check signed by Ms. Kronenberg and payable to "P. Kanchanalak," which was then deposited in an account held by Praitun Kanchanalak. On about September 11, Ms. Kronenberg advised Pauline Kanchanalak that she would provide the DNC with a \$40,000 check from Praitun Kanchanalak's account in connection with the Presidential Birthday event. On about September 13, 1996, a \$40,000 check payable to the DNC (imprinted and signed "P. Kanchanalak") was written on an account held by Praitun Kanchanalak, and Ms. Kronenberg then gave this check to John Huang of the DNC.

V. On June 21, 2000, Pauline Kanchanalak pled guilty to one count of conspiracy to cause the submission of false statements in violation of 18 U.S.C. § 371, and one count of having caused a corporate contribution in violation of 2 U.S.C. §§ 437g(d)(1)(A) and 441b and 18 U.S.C. § 2(b), based on charges stemming from the factual situation set forth in Section IV above. See United States v. Pauline Kanchanalak and Duangnet Kronenberg, Criminal No. 98-0241 (D.D.C. filed 1998). On April 20, 2001, the district court sentenced Pauline Kanchanalak to three years of probation, six months of house arrest, 200 hours of community service, and a

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\$3,000 criminal fine. Respondent also was the subject of extensive investigations by the United States Senate and United States House of Representatives that spanned over a two-year period.

VI. 1. Respondent knowingly and willfully violated 2 U.S.C. § 441e(a) in connection with the making of foreign national contributions and donations, as described in Section IV, ¶¶ 5-16.

2. Respondent knowingly and willfully violated 2 U.S.C. § 441f in connection with the making of contributions in the names of others, as described in Section IV, ¶¶ 5-13, 16.

VII. Respondent will pay a civil penalty to the Federal Election Commission in the amount of Twenty-Five Thousand Dollars (\$25,000). Respondent will cease and desist from violating 2 U.S.C. §§ 441e and 441f.

VIII. The Commission would ordinarily seek a civil penalty equal to 200% of the amount in violation for knowing and willful violations, pursuant to 2 U.S.C. § 437g(a)(5)(B), for a total of \$1,073,000 for the violations described in this agreement. However, the Commission has agreed to accept a lower civil penalty in settlement of this matter for the following reasons:

1. Respondent has pled guilty to one count of conspiracy to cause the submission of false statements in violation of 18 U.S.C. § 371, and one count of having caused a corporate contribution in violation of 2 U.S.C. §§ 437g(d)(1)(A) and 441b and 18 U.S.C. § 2(b), and has been sentenced to three years of probation, six months of house arrest, 200 hours of community service, and a \$3,000 criminal fine. Respondent also was the subject of extensive congressional investigations that spanned over a two-year period.

2. As a representation material to the Commission's agreement to substantially reduce the level of civil penalty that the Commission would ordinarily accept for this type of

activity, Respondent represents that Respondent's company Ban Chang International (USA) Inc. is no longer operational and Respondent no longer conducts business through it, and that the only asset of Respondent's company AEGIS Capital Management Limited is a bank account with a balance of less than \$100.

3. As a representation material to the Commission's agreement to substantially reduce the level of civil penalty that the Commission would ordinarily accept for this type of activity, Respondent represents that she currently has no assets or income with which she could pay a significant monetary penalty, that she is currently meeting her basic living expenses through financial support from her family and friends, that she has undisputed debts in excess of \$800,000, and that the materials she has submitted to the Commission to demonstrate her financial condition fairly and accurately represent her financial condition.

4. As a representation material to the Commission's agreement to substantially reduce the level of civil penalty that the Commission would ordinarily accept for this type of activity, Respondent represents that, as of the date she signs this Conciliation Agreement, her yearly net income after taxes, from all sources, totals less than \$25,000.

5. Respondent agrees that the Commission's acceptance of this Conciliation Agreement is conditioned on the truthfulness and completeness of the representations made by Respondent in Paragraph VIII, Subparagraphs 2, 3, and 4 above. Respondent further agrees that if any of these representations is false or omits material information concerning Respondent's current financial condition, such false statement or omission shall constitute a violation by Respondent of this Conciliation Agreement and grounds for the Commission to obtain relief against Respondent in a civil action pursuant to 2 U.S.C. § 437g(a)(5)(D). In such a civil action, if the court finds that Respondent falsely stated or failed to disclose any material fact concerning

Respondent's financial condition, Respondent agrees that the Commission may seek a civil penalty in an amount up to the maximum provided by the Act. Should a court order relief in connection with proceedings instituted under this Subparagraph, this Conciliation Agreement shall, in all other respects, remain in full force and effect.

IX. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

X. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

XI. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to pay the civil penalty described in Paragraph VII of this agreement and to so notify the Commission.


XII. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or

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oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence H. Norton
General Counsel

BY: 
Rhonda J. Vostding
Associate General Counsel

8/4/02
Date

FOR THE RESPONDENT:


Brian M. Hebertig
Counsel for Pauline Kanchanalak

7/9/02
Date